

10:05:12 1 A. Sometimes.

05:13 2 Q. If it's done right?

10:05:14 3 A. If it's done right, yes.

10:05:16 4 Q. And if it's -- what's the word I'm looking

10:05:19 5 for -- it's not as precise as a fusion splice, correct?

10:05:23 6 A. No, sir.

10:05:23 7 Q. And so it's used in emergency situations to

10:05:27 8 restore service?

10:05:28 9 A. Right.

10:05:28 10 Q. But it's not a high quality, acceptable,

10:05:31 11 long-term splice?

10:05:32 12 A. Right.

10:05:33 13 Q. For a long-term splice, more than say 30 days,

10:05:37 14 SWBT policy is to always use fusion splicing?

10:05:40 15 A. Yes, sir.

10:05:40 16 Q. And why is fusion splicing preferred over

10:05:44 17 mechanical splicing?

10:05:46 18 A. The reflective loss and the DB loss is a lot

10:05:51 19 less on fusion than it is on mechanical. You get a

10:05:59 20 better quality splice.

10:06:04 21 Q. Okay. And just so I'm not leaving anything

10:06:09 22 out, I would like to cover how -- if I said, okay,

10:06:19 23 Mr. Tijerina, here's a DWO that requires a splice be

10:06:23 24 made out in manhole 172, right here on Elm Street. Go

06:29 25 do it today. How do you go do a fusion splice that day?

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10:06:34 1 Tell me the procedure.

06:38 2 A. Well, the first thing I would do is look the
10:06:42 3 DWO over and see what's involved in getting to the
10:06:46 4 manhole, what fibers are being used.

10:06:51 5 Q. Typically when you go out to a splice -- to do
10:06:54 6 a splice, there are other fibers in that sheath that are
10:06:58 7 being used, correct?

10:06:59 8 A. Right. And then I go to the central office
10:07:03 9 and make sure the fibers are vacant or dead or not
10:07:07 10 working.

10:07:08 11 Q. The ones you're supposed to splice?

10:07:10 12 A. Right.

10:07:11 13 Q. Because almost every time you go out to a
10:07:14 14 splice case to splice, there are other fibers in there
10:07:17 15 that are working?

10:07:18 16 A. Yes. Now, if it's a working cable, we have
10:07:20 17 got that maintenance window time that we have got to
10:07:23 18 work on, which is from midnight until 6:00 in the
10:07:26 19 morning. If it's a working cable, we are not supposed
10:07:30 20 to get in them during the day.

10:07:32 21 Q. You're talking about splicing the working
10:07:34 22 cable?

10:07:35 23 A. Going into a working cable.

10:07:36 24 Q. And just so we understand, because I don't
07:38 25 want to be confused here, you're talking about the times

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10:07:42 1 when you've got to go in maybe and resplice a cable that
07:46 2 currently has traffic going over it, correct?

10:07:50 3 A. Correct.

10:07:50 4 Q. And you do that for SWBT every now and then,
10:07:53 5 correct?

10:07:53 6 A. I've got a crew that works nothing but nights.

10:07:56 7 Q. So you have a crew -- that's not a good job.

10:08:02 8 You have a crew that their sole job really is to work on
10:08:05 9 resplicing -- breaking and resplicing fiber optic cables
10:08:12 10 that currently have traffic going over them that are
10:08:15 11 being used by a customer?

10:08:16 12 A. Breaking fibers that are vacant to take
10:08:20 13 somewhere else. Not breaking working fibers;
10:08:23 14 non-working fibers.

10:08:25 15 Q. Okay. I thought we were talking about fibers
10:08:29 16 that had traffic on them.

10:08:30 17 A. No, no, no. Working -- fibers that have
10:08:34 18 traffic on them, we don't touch them.

10:08:36 19 Q. Well, what if you've identified a problem with
10:08:39 20 one of the splices on a working fiber?

10:08:42 21 A. By the time we get -- it gets to us, the
10:08:46 22 splicing foreman, that fiber has been turned off or the
10:08:51 23 power has been taken out of it.

10:08:53 24 Q. Okay.

08:54 25 A. Because the fiber is in trouble to start off

10:09:50 1 Q. And you have a crew -- how many work nights?
10:01 2 A. Two, two people.
10:10:05 3 Q. How often do your crews do manhole splices
10:10:10 4 into a splice case on dark fiber when there's also
10:10:16 5 working fiber in the sheath during the day?
10:10:24 6 A. Very seldom. Most of my work is -- is going
10:10:32 7 back into working cable or cable with working fibers in
10:10:37 8 them.
10:10:37 9 Q. Most of the splicing done, you're entering a
10:10:41 10 splice case where there are working fibers in there?
10:10:44 11 A. Yes, sir.
10:10:45 12 Q. And sometimes you do those in the day and
10:10:46 13 sometimes you do those at night?
10:10:48 14 A. The majority is at night.
10:10:51 15 Q. You say the majority is at night right now?
10:10:54 16 A. Yes, sir.
10:10:54 17 Q. Has that always been the case?
10:10:56 18 A. No.
10:10:57 19 Q. When did that happen?
10:10:58 20 A. It started back in 1991, '92.
10:11:06 21 Q. Okay. And I guess I'm confused, why do you do
10:11:13 22 that at night as opposed to doing it during the day?
10:11:16 23 A. At night there's less traffic on the fibers
10:11:19 24 than there would be during the day. It would be like
11:24 25 off-peak hours.

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10:11:25 1 Q. Right.

11:26 2 A. And that's the policy that Bell has now.

10:11:30 3 Q. So the nighttime work is just an added

10:11:35 4 precaution to make sure that the customers don't ever

10:11:43 5 face severe terminations of service?

10:11:45 6 A. Right.

10:11:46 7 Q. Okay. Because presumably, even if there were

10:11:50 8 a situation where, you know, some guy totally messed up

10:11:57 9 and disrupted a working fiber he could quickly fix it

10:12:02 10 back together again that night and not affect the

10:12:07 11 service during the daytime. Is that the thought?

10:12:16 12 A. Yes, sir.

10:12:18 13 MR. CRAWFORD: Do you want to take a

10:12:19 14 five-minute break?

10:12:23 15 MR. HARTLEY: Sure.

10:12:24 16 MR. CRAWFORD: Go off the record.

10:12:25 17 (Recess 10:12 to 10:21 a.m.)

10:21:49 18 Q. We were talking, Mr. Tijerina, about part of

10:21:52 19 your crew -- well, we were talking about opening splice

10:21:55 20 cases in the field when you go to make your splices on

10:21:59 21 dead count.

10:22:00 22 A. Right.

10:22:01 23 Q. And I think we have confirmed that the vast

10:22:06 24 majority of the time when you -- almost always when you

22:09 25 open a splice case to splice dead count together that

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10:22:12 1 there are working fibers in that splice case, correct?

22:15 2 A. Yes, sir.

10:22:15 3 Q. Now, I assume there are splicing procedures

10:22:19 4 set by SWBT to make sure that the splice is made

10:22:26 5 successfully without damaging other working fibers,

10:22:30 6 correct?

10:22:30 7 A. Yes, sir.

10:22:30 8 Q. Do you make sure that your crew is trained in

10:22:34 9 these procedures?

10:22:34 10 A. Yes, sir.

10:22:34 11 Q. Do they follow these procedures as a general

10:22:37 12 rule?

10:22:37 13 A. Yes, sir.

10:22:40 14 Q. When you were splicing fibers over a decade or

10:22:48 15 two of splicing fiber optic fibers, how often did you

10:22:53 16 open up a splice case with working fibers in it to

10:22:57 17 terminate some of the dark fibers or dead count that

10:22:59 18 were in that case?

10:23:00 19 A. What do you mean by --

10:23:02 20 Q. When you were splicing fiber --

10:23:04 21 A. Right.

10:23:05 22 Q. -- since I think you said 1983 --

10:23:07 23 A. Yes, sir.

10:23:11 24 Q. -- how often did you open up a splice case to

23:14 25 perform a splice and that splice case had working fibers

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10:23:17 1 in them?

23:22 2 A. Let's see. About 80 percent of the time.

10:23:30 3 Q. Okay. And I know this is a crazy question,

10:23:34 4 but how many splices do you think you have actually done

10:23:37 5 over your career?

10:23:43 6 A. I have no idea. Too many.

10:23:46 7 Q. Do it in your sleep, right.

10:23:51 8 Well, some interesting numbers. SWBT has

10:23:57 9 told us that in the state of Texas just counting the

10:24:01 10 times that its fiber is spliced to the fiber of a

10:24:08 11 third-party company, there are 200,000 splices in the

10:24:12 12 state of Texas.

10:24:12 13 A. Okay.

10:24:13 14 Q. Does that sound about right to you, too high,

10:24:17 15 too low, based on your experience?

10:24:21 16 A. What do you mean by -- to a customer?

10:24:26 17 Q. Okay. Well, I was talking -- what I was

10:24:28 18 talking about is not a customer but a third-party

10:24:31 19 company?

10:24:31 20 A. A third party --

10:24:33 21 Q. Like Verizon, GTE, Sprint, AT&T, that SWBT

10:24:40 22 fiber is spliced to fiber owned by another company.

10:24:47 23 A. The reason -- all SBC or just --

10:24:53 24 Q. SWBT, throughout Texas.

24:54 25 A. I have no idea.

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10:24:59 1 Q. If they say -- if they tell us it's 200,000,
25:02 2 do you have any reason to disagree with that number, or
10:25:12 3 would you believe them if they say it?

10:25:15 4 A. I don't understand what you're trying to tell
10:25:20 5 me. You mean --

10:25:28 6 Q. SWBT has told us that we -- we asked SWBT --
10:25:36 7 let me just digress. We asked SWBT how many splices are
10:25:41 8 in the state of Texas where SWBT has spliced fiber to
10:25:45 9 fiber owned by a company other than SWBT.

10:25:50 10 A. Uh-huh.

10:25:50 11 Q. And they've told us 200,000 splices,
10:25:54 12 connections, in the state of Texas. Does that sound
10:26:03 13 right to you?

10:26:04 14 A. I don't know.

10:26:05 15 Q. Have you ever spliced fiber to a third party
10:26:08 16 like GTE?

10:26:09 17 A. Yes, sir.

10:26:10 18 Q. So there are times when you take -- you have
10:26:13 19 taken GTE's fiber and SWBT's fiber and spliced the two
10:26:18 20 together?

10:26:18 21 A. Yes, sir.

10:26:19 22 Q. And why does that happen in your business?

10:26:24 23 A. I ain't got no idea. You know, off -- a
10:26:28 24 connection between SWBT and Verizon.

26:34 25 Q. Does it happen in a certain region more than

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10:26:37 1 others?

26:37 2 A. I don't know, because the only region I work

10:26:40 3 is right here, so...

10:26:41 4 Q. I mean, is that a common situation on the

10:26:45 5 borders of a service area, for instance?

10:26:48 6 A. Yes, sir.

10:26:49 7 Q. Because they have to connect as if they were

10:26:52 8 one phone company?

10:26:53 9 A. I guess. I don't have no idea.

10:26:55 10 Q. In your region, is there a service area

10:26:59 11 border?

10:26:59 12 A. Yes, sir.

10:26:59 13 Q. And who does SWBT border up against in terms

10:27:03 14 of service area?

10:27:05 15 A. Verizon.

10:27:07 16 Q. Used to be GTE, now Verizon, correct?

10:27:10 17 A. Yes.

10:27:11 18 Q. Now, any other ILECs or any other phone

10:27:18 19 company, smaller ones or regional ones that SWBT

10:27:23 20 geographically comes up to in your service area, other

10:27:27 21 than Verizon?

10:27:28 22 A. Not that I know of, no.

10:27:30 23 Q. And on that service border between SWBT and

10:27:34 24 Verizon, do -- explain to me what happens when their

27:38 25 fiber -- do they splice fiber together on a regular

10:27:42 1 basis, along that border?

27:44 2 A. What do you mean?

10:27:45 3 Q. On the service area border between SWBT and

10:27:50 4 Verizon --

5 A. Right, uh-huh.

10:27:51 6 Q. -- is SWBT fiber regularly spliced together

10:27:55 7 with Verizon fiber?

10:27:56 8 A. Not regularly, no.

10:27:58 9 Q. And I know regularly is an ambiguous term. So

10:28:02 10 let me be a little more clear. Are there -- there are

10:28:11 11 areas where SWBT fiber is spliced to Verizon fiber?

10:28:16 12 A. Yes, sir.

10:28:17 13 Q. You've done that before?

10:28:18 14 A. Yes, sir.

10:28:18 15 Q. You may have to do it again?

10:28:20 16 A. If I ever go to splicing, yes.

10:28:24 17 Q. Your crews may do it --

10:28:26 18 A. Yes, sir.

10:28:27 19 MR. HARTLEY: He's hoping he's beyond

10:28:30 20 that.

10:28:30 21 Q. I gathered that. I'm not making you nervous.

10:28:33 22 He hasn't told me anything.

10:28:35 23 A. I'm hoping to go back to splicing.

10:28:37 24 MR. HARTLEY: We will just see how well

28:39 25 this goes.

10:28:40 1 Q. I'll tell you, management is no fun, is it,
28:43 2 they don't pay you enough for that.

10:28:45 3 A. Tell me about it.

10:28:49 4 Q. If -- it is very possible that next week you
10:28:53 5 could get an order to have your crew splice a SWBT fiber
10:28:58 6 together with a Verizon fiber.

10:29:01 7 A. It's possible, yes.

10:29:02 8 Q. That would not surprise you if you saw one of
10:29:05 9 those?

10:29:05 10 A. No, sir.

10:29:05 11 Q. When your crews go out to splice a SWBT fiber
10:29:10 12 with a fiber owned by another company, such as Verizon
10:29:14 13 or another telephone carrier, will your crews perform
10:29:20 14 that splice any differently than the splice they would
10:29:23 15 do on a SWBT to SWBT fiber?

10:29:26 16 A. No, sir. It would be the same.

10:29:29 17 Q. Is it fair to say that your crews and you,
10:29:31 18 when you were splicing for 20-some-odd years, have a
10:29:35 19 single set of methods and procedures in your mind on how
10:29:38 20 to do the proper splice?

10:29:40 21 A. Yes, sir.

10:29:40 22 Q. And you will do that splice no matter who owns
10:29:43 23 that fiber?

10:29:44 24 A. Right, yes.

10:29:45 25 Q. And you also understand that sometimes, even

10:29:47 1 though SWBT may own both ends of the fiber you're
29:51 2 splicing, that sometimes a CLEC, another phone company,
10:29:56 3 may be leasing one of those fibers from SWBT?
10:29:59 4 A. Yes, sir.
10:30:01 5 Q. Do you know, when you were splicing or does
10:30:04 6 your crew know today when they're splicing, whether or
10:30:07 7 not a CLEC will be using the fiber that you're splicing?
10:30:11 8 A. No, sir.
10:30:12 9 Q. They don't tell you that, do they?
10:30:13 10 A. No, sir.
10:30:14 11 Q. And since you don't know whether that CLEC
10:30:16 12 is -- whether a CLEC is going to be using a fiber or
10:30:19 13 SWBT is going to be using that fiber, you do the same
10:30:25 14 proper splice no matter what?
10:30:26 15 A. Yes, sir.
10:30:27 16 Q. And that's the same for your crews?
10:30:29 17 A. Yes, sir.
10:30:31 18 Q. Okay. Have you ever heard someone say, oh, I
10:30:34 19 know this is going to be used by a CLEC, so I'm going to
10:30:37 20 do the splice in a poor manner?
10:30:40 21 A. No, sir.
10:30:41 22 Q. Have you ever heard anybody even think about
10:30:43 23 that?
10:30:44 24 A. No.
.30:45 25 Q. Is it fair to say your crews are going to do

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10:30:48 1 the solid quality splice no matter what?

30:52 2 A. Yes, sir.

10:30:53 3 Q. No matter who is using that fiber?

10:30:55 4 A. Right.

10:30:55 5 Q. Even if that SWBT fiber is connected to fiber

10:31:07 6 owned by another company?

10:31:10 7 A. Yes, sir.

10:31:10 8 Q. You currently have one crew that works

10:31:17 9 exclusively after hours, correct?

10:31:19 10 A. Yes, sir.

10:31:21 11 Q. And they are the crew that you use to open

10:31:26 12 splice cases that have working fibers in them?

10:31:29 13 A. Yes; sir.

10:31:30 14 Q. So if -- in the many instances when you've got

10:31:36 15 to go splice two dead count fibers in a splice case and

10:31:41 16 there's working fibers in that splice case, you use this

10:31:46 17 crew?

10:31:46 18 A. Yes, sir.

10:31:47 19 Q. And how many days a week do they work?

10:31:50 20 A. Five days, five nights, Monday through Friday.

10:31:56 21 Q. They have five working days no matter what

10:31:59 22 their working hour period is?

10:32:02 23 A. Right.

10:32:02 24 Q. Then they get two days off, correct?

32:04 25 A. Correct.

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10:32:05 1 Q. When they go out in the field, is their
10:32:09 2 primary task do these field splices in splice cases with
10:32:13 3 working fibers?
10:32:15 4 A. I don't understand.
10:32:16 5 Q. Is that what they spend most of their time
10:32:18 6 doing?
10:32:20 7 A. Splicing fibers, yes.
10:32:22 8 Q. Let me be clear. Do they spend most of their
10:32:25 9 time during their shift doing splicings in buildings or
10:32:33 10 out in the field opening splice cases with working
10:32:36 11 fibers in them?
10:32:37 12 A. Out in the field, in the manholes.
10:32:40 13 Q. Okay. So do they do much building work at
10:32:45 14 all?
10:32:46 15 A. Very seldom.
10:32:47 16 Q. So the vast majority of their shift is spent
10:32:50 17 doing field splicing --
10:32:52 18 A. Yes, sir.
10:32:52 19 Q. -- in the splicing vans, where they open
10:32:55 20 splice cases with working fibers in them?
10:32:57 21 A. Yes, sir.
10:32:58 22 Q. And they do that five days a week?
10:33:00 23 A. Yes, sir.
10:33:02 24 Q. Fifty weeks a year, more or less?
10:33:04 25 A. Yes, sir.

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10:33:07 1 Q. And that's only for the North Dallas area,
33:10 2 though, right?

10:33:11 3 A. Well, that's just my crew in North Dallas,
10:33:16 4 yes.

10:33:16 5 Q. Just in your region?

10:33:16 6 A. Right.

10:33:16 7 Q. That doesn't even include the main Dallas
10:33:19 8 region, right?

10:33:20 9 A. Right.

10:33:20 10 Q. In the main Dallas region presumably there's
10:33:24 11 other crews doing the same thing?

10:33:26 12 A. No, sir.

10:33:26 13 Q. Do you know how many crews they have doing
10:33:28 14 that?

10:33:28 15 A. I have no idea.

10:33:32 16 Q. And we talked about the fact that your crew
10:33:40 17 that works after hours on these splice cases with
10:33:43 18 working fibers in them follow set procedures so as not
10:33:47 19 to damage the working fibers, correct?

10:33:49 20 A. Yes, sir.

10:33:50 21 Q. Okay. Have you in your many years splicing
10:34:05 22 fiber optic cable ever cut through the sheath of a fiber
10:34:09 23 cable that had working fibers in it to expose the fibers
10:34:13 24 to place in a splice case?

34:17 25 A. What do you mean?

10:34:18 1 Q. Let me back up and unpack that a little bit.
34:21 2 When you go out to a splice case --
10:34:24 3 A. Yes.
10:34:25 4 Q. -- the fibers are pretty much already exposed
10:34:28 5 once you open the splice case, correct?
10:34:31 6 A. Uh-huh.
10:34:31 7 Q. Is that right?
10:34:32 8 A. Yes, sir.
10:34:33 9 Q. Sometimes, though, you'll be in a situation
10:34:37 10 where you need to cut a sheath open to get access to the
10:34:41 11 fibers, correct?
10:34:42 12 A. Yes, sir.
10:34:44 13 Q. And so you've got this -- if I can visualize a
10:34:49 14 large, hard, black hose.
10:34:51 15 A. Uh-huh.
10:34:51 16 Q. And you need access to fibers in there?
10:34:54 17 A. Yes, sir.
10:34:54 18 Q. And they are not exposed?
10:34:56 19 A. Uh-huh.
10:34:56 20 Q. So you cut the black hose open?
10:35:00 21 A. Right.
10:35:00 22 Q. With a big, for lack of a better term, knife?
10:35:04 23 A. Right.
10:35:04 24 Q. And inside that black fiber optic cable sheath
35:09 25 are working fibers?

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10:35:11 1 A. Yes, sir.

35:14 2 Q. So you're careful when you're really just

10:35:14 3 holding the hose in one hand and the knife in the

10:35:17 4 other --

10:35:17 5 A. Right.

10:35:18 6 Q. -- to carefully cut the black sheath around

10:35:23 7 the fibers without going so deep as to actually cut the

10:35:26 8 fibers?

10:35:27 9 A. Right.

10:35:27 10 Q. Is that correct?

10:35:28 11 A. Yes, sir.

10:35:29 12 Q. And because it -- and you've done that

10:35:35 13 numerous times throughout your career, correct?

10:35:38 14 A. Yes, sir.

10:35:39 15 Q. I'm sorry?

10:35:40 16 A. Yes, sir.

10:35:41 17 Q. In all the times that you've cut open a fiber

10:35:46 18 sheath with a knife, have you ever cut into working

10:35:48 19 fibers?

10:35:50 20 A. Yes, sir.

10:35:50 21 Q. You have?

10:35:51 22 A. Yes, sir.

10:35:53 23 Q. How many times have you cut into a sheath?

10:35:57 24 A. Into a sheath?

35:58 25 Q. Yes, with a knife. Thousands?

10:36:02 1 A. Hundreds.

36:04 2 Q. Hundreds of thousands?

10:36:05 3 A. No, hundreds of times.

10:36:07 4 Q. Hundreds of times.

10:36:08 5 And out of those hundreds of times, how

10:36:13 6 many times have you actually cut into a working fiber?

10:36:19 7 A. I cut about five different fibers -- five

10:36:22 8 different times I cut fibers --

10:36:24 9 Q. Okay.

10:36:25 10 A. -- in the times I did it.

10:36:34 11 Q. And what did you do to fix them?

10:36:37 12 A. Opened the cable -- once I opened it, fuse the

10:36:42 13 fiber together.

10:36:43 14 Q. How long did that take you?

10:36:50 15 A. Setting the cable up is what takes longer.

10:36:52 16 Q. In the times where you actually cut a working

10:36:55 17 fiber, I presume you wanted to quickly fuse it together?

10:36:58 18 A. Yes, sir.

10:36:59 19 Q. How long did it take you?

10:37:00 20 A. Anywhere from 15 to 20 minutes.

10:37:03 21 Q. Okay. So within 15 to 20 minutes, you had

10:37:06 22 that fiber spliced back together?

10:37:08 23 A. Yes, sir.

10:37:09 24 Q. Did you ever get in trouble for that?

10:37:11 25 A. I had to write some letters several times.

10:37:15 1 Q. People wrote letters to you?

37:17 2 A. No, I had to write them to tell what happened.

10:37:19 3 Q. So you wrote a letter to an engineer or

10:37:21 4 somebody or to some superior explaining to him that you

10:37:25 5 had a mishap and that you fixed it and everything was

10:37:29 6 fine, right?

10:37:30 7 A. Yes, sir.

10:37:30 8 Q. After you wrote those letters, did anything

10:37:33 9 bad happen to you?

10:37:34 10 A. No, sir.

10:37:41 11 Q. I forgot to ask you earlier, have you ever won

10:37:45 12 any awards or had any honors or special recognition from

10:37:50 13 SWBT for your work? I understand most of us don't get

10:37:57 14 it, so I'm curious whether or not you ever got one,

10:38:01 15 splicer of the year award.

10:38:02 16 A. I got a clock once for a job I did. That's

10:38:05 17 about it.

10:38:05 18 Q. You got a what?

10:38:08 19 A. A clock.

10:38:10 20 Q. A clock?

10:38:10 21 A. Yes, sir.

10:38:10 22 Q. For what job?

10:38:11 23 A. We did a job for -- I think it was Fidelity

10:38:15 24 Investments or something, and for the -- for a great job

38:20 25 done, you know, a good job. That was done.

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10:38:23 1 Q. Was there something challenging about that
38:26 2 job?

10:38:26 3 A. Oh, yes, most definitely.

10:38:29 4 Q. Worth a clock, huh.

10:38:32 5 What was the challenging part?

10:38:34 6 A. The time frame we had to do it in and the
10:38:37 7 restrictions that Fidelity Investments gave us.

10:38:39 8 Q. What were those restrictions?

10:38:43 9 A. They dictated what times we could work, when
10:38:46 10 we could be there, what hours and everything.

10:38:50 11 Q. Right. And what was the time restriction?
10:38:52 12 Did you have to do something really fast?

10:38:54 13 A. Yes, sir.

10:38:55 14 Q. Did you have to --

10:38:57 15 A. Like we could only work on weekends, certain
10:39:00 16 hours.

10:39:01 17 Q. Right. We were talking about cutting open a
10:39:20 18 sheath with a knife and you mentioned you've done it
10:39:24 19 hundreds of times, correct?

10:39:26 20 A. Uh-huh.

10:39:27 21 Q. But that's not the normal way to get access to
10:39:29 22 fiber, is it?

10:39:30 23 A. No, sir.

10:39:31 24 Q. Normally there will be fiber in a splice case
39:34 25 in a manhole that you can easily gain access to, right?

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10:39:38 1 A. If you want to call it easily, yes.

39:42 2 Q. Well, easier than having to cut open a sheath

10:39:46 3 with a knife, right?

10:39:47 4 A. Yes, sir.

10:39:51 5 Q. We have used the term splice case. Can you

10:39:54 6 tell me what a splice case is?

10:39:56 7 A. A splice case is a -- is a closure or a -- we

10:40:01 8 use -- where we put the end of a cable, where there's a

10:40:06 9 splice point. We open up the cable, put it in the

10:40:10 10 splice case and inside the splice case is a chamber

10:40:13 11 where we put trays, where we put the ribbons in, or the

10:40:18 12 fibers, where we make our splices, and it's a water

10:40:24 13 tight case where the water won't get in it.

10:40:27 14 Q. It's about the size of a couple of shoe boxes,

10:40:37 15 right?

10:40:38 16 A. It depends on the supplier.

10:40:43 17 Q. Okay.

10:40:47 18 A. We have used three different ones since I've

10:40:50 19 been splicing, three different types.

10:40:53 20 Q. Okay. What's the main type you run into in

10:40:56 21 the field?

10:40:57 22 A. It's a Lucent 2600.

10:41:12 23 Q. Lucent 2600. So it's -- so is that the one

10:41:17 24 that's about the size of two shoe boxes?

41:20 25 A. No.

10:41:20 1 Q. How big is a Lucent 2600?

10:41:24 2 A. The 2600, it's a tube about this long.

10:41:28 3 Q. About --

10:41:29 4 A. Three feet long. It's a tube.

10:41:31 5 Q. Fibers run into each end of it, right?

10:41:34 6 A. No, they come in on one end only.

10:41:37 7 Q. One end only, okay.

10:41:39 8 And it screws shut, right?

10:41:42 9 A. No. It's got a steel band that holds it --

10:41:46 10 the dome to the -- where the cables come in.

10:41:49 11 Q. Is that the kind with the buckle and you pop

10:41:52 12 open the buckle and the band comes off?

10:41:54 13 A. No. This one has got a screw that you tighten

10:41:57 14 down on the band.

10:41:58 15 Q. So you take the screw out, the band comes off

10:42:00 16 and you open the splice case revealing the splice trays?

10:42:04 17 A. Right.

10:42:04 18 Q. And you said the majority of times when you

10:42:06 19 open a splice case, you'll see working fibers in there,

10:42:10 20 correct?

10:42:10 21 A. You see all the fibers. All the fibers are

10:42:13 22 exposed.

10:42:13 23 Q. And almost 80 percent of the time there will

10:42:19 24 be working fibers in there, correct?

10:42:21 25 A. Yes, sir.

10:42:21 1 Q. And you will have done your homework to know
42:24 2 which ones are working and which ones are not, correct?

10:42:27 3 A. Yes. We go to the office and verify which
10:42:29 4 ones are working and which are not.

10:42:30 5 Q. And the fibers are labeled generally, right,
10:42:32 6 or color coded on the --

10:42:32 7 A. Yes, sir.

10:42:33 8 Q. So if you've done your homework, you know
10:42:35 9 which of the fibers in front of you are carrying traffic
10:42:38 10 and which are not?

10:42:39 11 A. Yes, sir.

10:42:40 12 Q. And then you'll see the fibers -- your next
10:42:45 13 task would be to locate the two fiber ends that you need
10:42:48 14 to splice together?

10:42:49 15 A. Yes, sir.

10:42:49 16 Q. And I'm assuming you've already pulled the
10:42:52 17 splice case into the splice van, correct?

10:42:55 18 A. Yes.

10:42:55 19 Q. That's where you open the splice case?

10:42:57 20 A. Yes.

10:42:57 21 Q. And you take the two ends and put them into
10:42:59 22 the fuser and fuse them together, correct?

10:43:02 23 A. Once we verify the fibers that we need.

10:43:04 24 Q. Right. You fuse them together using your
43:06 25 fusing machine, correct?

10:43:08 1 A. Right.

43:08 2 Q. And then you put a fuse cover over them after

10:43:12 3 the fact, right?

10:43:13 4 A. Protection, yes.

10:43:13 5 Q. Put them back in the case, close the case, put

10:43:17 6 the case back in the hole; is that correct?

10:43:19 7 A. Yes, sir.

10:43:19 8 Q. These splice cases, do they come with a

10:43:22 9 limitation on how many times you can open them? Can you

10:43:25 10 only open them 10 or 20 times?

10:43:27 11 A. No, sir, not that I know of.

10:43:29 12 Q. You could -- the truth is you can open them

10:43:31 13 everyday if you needed to, right?

10:43:33 14 A. If we had to, yes.

10:43:42 15 Q. How long does it take one of these splice

10:43:44 16 cases to wear out just from being in the manhole?

10:43:47 17 A. I have no idea.

10:43:48 18 Q. Have you ever seen one in 20 years?

10:43:50 19 A. No.

10:44:05 20 Q. And if splicing is done -- I think we talked

10:44:10 21 about this, if splicing is done according to SWBT's

10:44:13 22 proper methods and procedures, is there any reason it

10:44:16 23 cannot be done in a safe and controlled manner?

10:44:20 24 A. What do you mean?

44:21 25 Q. When you're opening that splice case -- let me